

§ 1:893 Affidavit- In support of motion to dismiss for want of diversity of citizenship-assignment of claim to plaintiff sham and made to harass defendant. [Fed. R. Civ.P. 12(b)(1)]

Maria Romero, Alfonso Trigo, being duly sworn, says:

1. She is the defendant in the above-entitled action.

2. This is an action to nature of [Trademark infringement]

3. On or about [07/25/2016], Plaintiff's signor purported to assign [his/her] claim against defendant to the plaintiff.

4. Maria Romero, acted in good faith after having communicated with plaintiff, and made all the necessary changes to avoid any type of litigation. While at the same time keeping communication with the Plaintiff in regards as to the status of the changes. defendant were and still are residents of the City of [Lewisville], County of [Dallas], State of [Texas]

5. Prior to the filing of the action and on or about [July, 13 2016] Defendant and assignor had a conversation [via email] in the course of which the defendant informed assignor that [he/she] had acted in good faith and made all the necessary changes. Assignor, then and there stated that [he/she] would assign [his/her] claim to plaintiff and bringing an action against defendant in Federal court if defendant did not pay and in disclose amount money. The assignor then made a declaration that if the defendant did not waive [his/her] objections to pay it forthwith [He/she] the assignor, would make it necessary for the defendant to spend a large amount of money in the defense and preliminary phase of the federal court action before it would even come to trial.

6. The purported assignment was made by [Coyote Logistics] plaintiff, for the sole purpose of harassing defendant and infliction of great financial hardship on defendant by requiring the litigation of the alleged claim.

7. [Greenberg Traurig, LLP] Law firm for plaintiff is a resident of [Dallas, TX] and has for many years past been regularly employed by [Coyote logistics]

Case 3:16-cv-02132-G

Page 2

Dated, August, 8 2016

Respectfully submitted,

/s/ Maria Romero

Maria Romero

5500 state hwy 121 apt# 2137

Lewisville TX 75056

Tel: 972-972-595-4990

Case 3:16-cv-02132-G

Dated, August, 8 2016

Page 3

Certification of service

I certify that on August 8, 2016, I served the foregoing motion on plaintiff's by email.

/s/ Maria Romero

Maria Romero

EXHIBIT A

GT GreenbergTraurig

Cameron M. Nelson
Tel 312.456.6590
Fax 312.456.8435
NelsonC@gtlaw.com

July 6, 2016

VIA EMAIL & UPS

Maria Alexandra Romero
5500 State Hwy 121 #2137
The Colony, TX 75056-4321

Alfonso Trigo
2140 Medical District Dr. Apt. 1057
Dallas, TX 75235-8083

Alfonso Trigo
2610 W Colorado Blvd., Apt. C
Dallas, TX 75211-1705

Maria Alexandra Romero
Alfonso Trigo
6119 Greenville Ave., #546
Dallas, TX 75206

coyotefastneasy@gmail.com

Re: Counterfeiting of Coyote Logistics Trademark

Ms. Romero and Mr. Trigo:

We are counsel to the *real* Coyote Logistics. Coyote Logistics has been in the transportation logistics business since 2006. It has invested substantial resources and developed substantial goodwill surrounding its brand name, and as a result has secured federal trademark registrations, including Registration No. 3,523,958 for COYOTE LOGISTICS, and Registration No. 4,221,250 for COYOTE (stylized). Coyote Logistics is well-known in the transportation industry.

It has come to our attention that you are attempting to pass yourself off as Coyote Logistics. You created a Texas for-profit corporation called Coyote Logistics, Inc., registered with the FMCSA, and have been advertising your purported "services." It appears that you are – *at best* – passing your own business off as Coyote Logistics in an effort to trade off of Coyote Logistics' goodwill.

ALBANY
AMSTERDAM
ATLANTA
AUSTIN
BOCA RATON
BOSTON
CHICAGO
DALLAS
DELAWARE
DENVER
FORT LAUDERDALE
HOUSTON
LAS VEGAS
LONDON*
LOS ANGELES
MEXICO CITY
MIAMI
MILAN**
NEW JERSEY
NEW YORK
NORTHERN VIRGINIA
ORANGE COUNTY
ORLANDO
PHILADELPHIA
PHOENIX
ROME**
SACRAMENTO
SAN FRANCISCO
SEOUL*
SHANGHAI
SILICON VALLEY
TALLAHASSEE
TAMPA
TEL AVIV*
TOKYO*
WARSAW*
WASHINGTON D.C.
WESTCHESTER COUNTY
WEST PALM BEACH

* OPERATES AS
GREENBERG TRAURIG LIMITED
* OPERATES AS
GREENBERG TRAURIG, D.C.
* STRATEGIC ALLIANCE
* OPERATES AS
GREENBERG TRAURIG LLP
FUNDING LEGAL CONSULTANT OFFICE

* ADVISORY
GREENBERG TRAURIG, P.A.
FLORIDA USA

* OPERATES AS
GREENBERG TRAURIG HONGKONG LIMITED

Alexandra Romero and Alfonso Trigo
Page 2

Coyote Logistics takes infringement of its trademarks and misuse of its brand name seriously. Your actions constitute illegal counterfeiting of Coyote Logistics' federally registered trademarks. If you do not immediately cease your illegal activity, Coyote Logistics will be forced to pursue all available legal remedies. These remedies may include a civil action seeking an injunction and statutory damages – which can be as high as \$2,000,000 per trademark.

If you wish to avoid potential litigation, we ask that you:

- Immediately cease all activities in connection with the COYOTE mark.
- Immediately surrender your corporation to the State of Texas and/or change its name to one that does not create a likelihood of confusion with the COYOTE mark.
- Immediately provide us with copies of all correspondence and transaction records regarding all business you have conducted under the COYOTE mark.
- Enter into a written settlement agreement acknowledging your counterfeiting of the COYOTE mark and agreeing to cease and desist all use of the COYOTE mark.

Please contact us immediately to discuss these matters. If we do not hear from you in the next 48 hours, we will assume that you have elected to continue your willful counterfeiting of the COYOTE mark.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Cameron M. Nelson', with a long, sweeping horizontal line extending to the right.

Cameron M. Nelson

July, 11 2016

Alfon Trigo
6119 Greenville ave #546
Dallas, Tx 75206

Maria Romero
6119 Greenville ave
Dallas, Tx, 75206

Maria Romero, Alfonso Trigo, owners of Coyote Logistics, Incorporation. Base out of 6119 Greenville ave #546 Dallas, Tx 75206 Is in acknowledgement of the claim of (Cayote) for Trademark No: 3,523,958 No: 4,221,250

Upon a closer examination of Trademark No: 3,523,958 No: 4,221,250 Maria Romero, Alfonso Trigo, and counsel advise agrees to the terms as such.

0.1 Immediately cease all activities in connection with the COYOTE mark.

0.2 change its name to one that does not create a likelihood of confusion with the COYOTE mark.

0.3 Immediately provide us with copies of all correspondence and transaction records regarding all business you have conducted under the COYOTE mark.

0.4 agreeing to cease and desist all use of the COYOTE mark.

President and Owners:

Alfonso Trigo

Date:

Maria Romero

Date:



Office of the Secretary of State

July 13, 2016

Attn: Trigo Alfonso

Trigo Alfonso
6119 Greenville ave, #546
Dallas, TX 75206 USA

RE: Pro GL, Inc.
File Number: 802418860

It has been our pleasure to file the Certificate of Amendment for the referenced entity. Enclosed is the certificate evidencing filing. Payment of the filing fee is acknowledged by this letter.

If we may be of further service at any time, please let us know.

Sincerely,

Corporations Section
Business & Public Filings Division
(512) 463-5555

Enclosure

Form 424

Secretary of State
P.O. Box 13697
Austin, TX 78711-3697
FAX: 512/463-5709

Filing Fee: See instructions



**Certificate
of Amendment**

**Filed in the Office of the
Secretary of State of Texas
Filing #: 802418860 07/12/2016
Document #: 679559970002
Image Generated Electronically
for Web Filing**

Entity Information

The filing entity is a: **Domestic For-Profit Corporation**

The name of the filing entity is: **Coyote Logistics Incorporated**

The file number issued to the filing entity by the secretary of state is: **802418860**

Amendment to Name

The amendment changes the formation document of the filing entity to change the article or provision that names the entity. The article or provision is amended to read as follows:

The name of the filing entity is:

Pro GL, Inc.

A letter of consent, if applicable, is attached.

Statement of Approval

The amendment has been approved in the manner required by the Texas Business Organizations Code and by the governing documents of the entity.

Effectiveness of Filing

☐ A. This document becomes effective when the document is filed by the secretary of state.

☒ B. This document becomes effective at a later date, which is not more than ninety (90) days from the date of its filing by the secretary of state. The delayed effective date is: **July 13, 2016**

Execution

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and declares under penalty of perjury that the undersigned is authorized under the Texas Business Organizations Code to execute the filing instrument.

Date: **July 12, 2016**

Maria romero Alexandra

Signature of authorized person

FILING OFFICE COPY

EXHIBIT B

From: nelsonc@gtlaw.com
Subject: RE: Trademark
Date: July 13, 2016 at 5:01 PM
To: atrigo223@gmail.com
Cc: galism@gtlaw.com, palnitkarb@gtlaw.com

Alfonso,

Thank you for your letter. Since you sent it to us directly, we assume that you have chosen not to retain counsel. Please let us know if this is incorrect, or if you choose to retain counsel at a later date.

We appreciate that you and your colleagues are taking this matter seriously and that you have agreed, in principle, to our requests.

We also appreciate that you have reconsidered your initial position - which was that you were free to use the COYOTE marks simply because you had created a corporation in the State of Texas with that name. Unfortunately, based on your earlier responses, we had already begun work preparing a Complaint and motion for temporary restraining order, and were in fact about to file them when we received your email on Monday. Because of that, Coyote Logistics is now requesting that you and your colleagues pay for a portion of the legal fees incurred in direct response to your position. We note that, under 15 U.S.C. 1117, an award of attorneys' fees is mandatory in a counterfeiting case. Since you changed your position in time to avoid a lawsuit, Coyote Logistics is prepared to accept less than the full amount of fees incurred in this matter. Accordingly, please find attached a draft formal settlement agreement, which includes provision for payment of \$5,000 in settlement of this matter.

Please review the draft settlement agreement and let us know if you have any questions or comments. We do recommend you have counsel look over the draft agreement. I can be reached at the phone numbers below if you, or your counsel, would like to discuss the draft settlement agreement.

Thank you,
Cameron

Cameron M. Nelson
Shareholder
Greenberg Traurig, LLP | 77 West Wacker Drive
Suite 3100 | Chicago, IL 60601
Tel 312.456.6590 | Fax 312.899.0360 | Cell 708.227.7106
NelsonC@gtlaw.com | www.gtlaw.com

-----Original Message-----

From: alfonso trigo [mailto:atrigo223@gmail.com]
Sent: Monday, July 11, 2016 3:39 PM
To: Nelson, Cameron (Shld-Chi-IP-Tech)
Subject: Trademark

Mr. Cameron,

Here is the response to our position on Coyote Trademark dispute.

If you are not an intended recipient of confidential and privileged information in this email, please delete it, notify us immediately at postmaster@gtlaw.com, and do not use or disseminate such information.



21353055_v
1_Settleme...tics.DOCX

Date: July, 25-2016

From: Alfonso Trigo
6119 Greenville ave #546
Dallas, Tx 75206

Maria Romero
6119 Greenville ave #546
Dallas, Tx 75296

Coyote Logistics, Inc.
MC# 963906

Coyote Logistics, Inc. Residing at 6119 Greenville ave #546 Dallas, Tx 75206 has implemented and amendment under article of incorporation. Due to the likelihood of comparison or confusion two other companies like (coyote logistics) We at (Coyote Logistics, Inc) Residing at 6119 Greenville ave #546 Dallas, Tx 75206 have you implemented the following amendments.

Coyote Logistics, Inc. NEW ARTICLE OF INCORPORATIONS amendment NAME: PRO-GL,INC. RISDING AT 6119 GREENVILLE AVE #546 DALLAS, TX 75206

PLEASE BE ADVISE THE ONLY THING THAT WE NEED TO UPDATE AT THIS POINT IN TIME ARE THE ARTICALS OF INCORPORATION.

Officer/Owners:



The block contains two handwritten signatures, each written over a horizontal line. The top signature is smaller and more compact, while the bottom signature is larger and more stylized, with a prominent loop at the end.

Section**C****NAME CHANGES ONLY***Is there any change in ownership, management, or control of the company? Are you a Mexican carrier?**Submit Name Change Requests to FMCSALicensing@dot.gov or fax to (202) 366-3477.*

☐ **Yes** — if you answer yes to one of the questions, you must report a transfer of authority or select one of the options in the next box:

☒ **No** — there is no change in ownership; skip the next box and enter new name below it:

I am making one of the following changes which does not require a transfer (select one) but does require documentation (include with form submission):

- ☐ Addition or deletion of close blood relatives, i.e., child, spouse, or sibling (notarized letter enclosed)
- ☐ Addition of partner through marriage (marriage license enclosed)
- ☒ Changes to existing corporation (copy of articles of incorporation from the state government enclosed)
- ☐ Deletion of partner through death (copy of death certificate enclosed)

- ☐ Deletion of spouse due to divorce (copy of divorce agreement enclosed)
- ☐ Incorporating (copy of articles of incorporation from the state government enclosed)
- ☐ I am an MX carrier and am also enclosing a copy of my Tarjeta de Circulacion

Pro-GL, INC.

Pro-GL, Inc.

NEW LEGAL NAME

NEW "DOING BUSINESS AS NAME"

(personal, partnership, or corporation)

(if different from legal name)

☒ I authorize the Federal Motor Carrier Safety Administration to charge \$14 to the credit card below for this name change.

☐ I have attached payment in the amount of \$14 in the form of a check or money order, payable to FMCSA, to the address in Section E.

Section**D****REINSTATEMENT OF OPERATING AUTHORITY ONLY***Submit Reinstatements to FMCSAReinstatements@dot.gov or fax (202) to 385-2422.*

I would like to reinstate the following authority(s):

Motor carrier operating authority

Broker authority

Freight Forwarder authority

Please check the box to indicate your assent to this statement:

I understand that reinstatements may not be processed immediately. It is the responsibility of the motor carrier to ensure that they are in full compliance with all FMCSA regulations prior to beginning interstate operations. More instructions can be found at www.fmcsa.dot.gov/FAQ.

AND check one of the following options:

- ☐ I authorize the Federal Motor Carrier Safety Administration to reinstate the operating authority of the Motor Carrier/Broker/Freight Forwarder identified above. I understand that the credit card below will be charged \$80, and that this Authorization will be stored electronically with the credit card number obscured, except for the last four numbers.
- ☐ I authorize the Federal Motor Carrier Safety Administration to reinstate the operating authority of the Motor Carrier/Broker/Freight Forwarder identified above. I have attached payment of \$80 in the form of a check or money order, payable to FMCSA, to the address in section E.

Section**E****PAYMENT: NAME CHANGES AND REINSTATEMENTS ONLY**

Pursuant to 49 CFR 360.3(c), fees are not refundable. After the application or document has been accepted for filing by the FMCSA, the filing fee will not be refunded, regardless of whether the document is granted or approved, denied, rejected, dismissed or withdrawn.

5152413004798781

CREDIT CARD NUMBER

☐ VISA☒ MasterCard

02/20

☐ American Express☐ Discover

EXPIRATION DATE

☒ \$14 (Name Change)

PAYMENT: \$80 (Reinstatement)

Angel M Lugo

3824 Cedar Springs Rd

Dallas,

NAME ON CARD

BILLING ADDRESS

CITY

Texas

75219

7/18/16

STATE/PROVINCE

ZIP CODE

SIGNATURE

DATE

I am paying with a check or money order, which I will send with this form to:

☐ **Regular mail:**

Federal Motor Carrier Safety Administration
P.O. Box 530226
Atlanta, GA 30353-0226

☐ **Overnight express mail:**

Bank of America
Lockbox Number 530226
1075 Loop Road
Atlanta, GA 30337

in:sent

[Click here to enable desktop notifications for Gmail.](#) **Le:**

Gmail

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COMPOSE

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alfonso

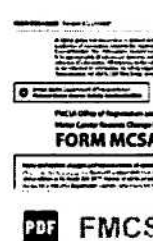
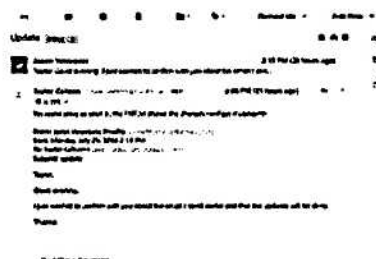
alfonso trigo <atrigo223@gmail.com>

Jul 26 (8 d)

to nelsonc

Here is our new articles of incorporation as well as the FMCSA filing

3 Attachments



PDF Certificate cop..

PDF FMCSA

[Click here to Reply or Forward](#)0.05 GB (0%) of 15 GB used
[Manage](#)[Terms - Privacy](#)

Last acco

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2126-0060. Public reporting for this collection of information is estimated to be approximately 15 minutes per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are voluntary. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, Federal Motor Carrier Safety Administration, MC-RRA, 1200 New Jersey Avenue, SE, Washington, D.C. 20590.



United States Department of Transportation
Federal Motor Carrier Safety Administration

FMCSA — Office of Registration & Safety Information
6th Floor, 1200 New Jersey Ave. SE, Washington, DC
Fax: (202) 366-3477 (Licensing)
(202) 385-2422 (Insurance)
Customer Service: (800) 832-5660

FMCSA Office of Registration and Safety Information

Motor Carrier Records Change Form

FORM MCSA-5889

Name and address changes and reinstatements of operating authority can be requested on our web site at https://public.fmcsa.dot.gov/MI-EV/PKG-REGISTRATION/reg_option (supporting documents must be submitted separately). If you do not have access to the Internet you may submit this form to the above address or fax to 202-366-3477. There is no fee for an address change, but name changes cost \$14 and reinstatements \$80. For more assistance with these transactions and other Registration, Licensing and Insurance functions (including transfers of operating authority), see the FAQs at <http://www.fhwa.dot.gov/fmcsa>. Please submit all the requested data in Section A as represented in your current DOT records. Changes can be indicated in Section B for address changes, Section C for name changes, and Section D for Reinstatements. Credit card information can be submitted in Section E. Any partially-submitted data will be kept for 30 days. If the rest of the information is not submitted within that time, the submitted data will be discarded. **FMCSA cannot make any changes until all required data is supplied.**

Section A

ALL MUST COMPLETE

7/18/16

TODAY'S DATE

jvfreeservice@gmail.com

REQUESTOR'S FAX NUMBER (include area code)

REQUESTOR'S E-MAIL ADDRESS (if any)

MOTOR CARRIER IDENTIFICATION INFORMATION:

Coyote Logistics

Coyote Logistics

CURRENT LEGAL NAME (personal, partnership, or corporation)

CURRENT "DOING BUSINESS AS NAME" (if different from legal name)

963906

2873615

DOCKET/MC NUMBER

DOT NUMBER

MX NUMBER: (MX only)

RFC NUMBER: (MX only)

FF NUMBER: (freight forwarders only)

ADDRESSES (as currently listed in FMCSA systems):

6119 Greenville Ave #546

Dallas

TX

75206

214-295-6383

STREET ADDRESS

CITY

STATE/PROV.

ZIP CODE

TELEPHONE NUMBER
(include area code)

PHONE NUMBERS:

214-295-6383

214-295-6383

CURRENT BUSINESS NUMBER
(include area code)

CURRENT CELL PHONE
NUMBER (include area code)

APPLICANT/REPRESENTATIVE SIGNATURE:

Form was completed by: ☐ Applicant ☒ Representative

NAME (print or type)

CEO

TITLE

SIGNATURE

Section B

ADDRESS CHANGES ONLY

Submit Address Change Requests to FMCSALicensing@dot.gov or fax to (202) 366-3477.

Same

NEW STREET ADDRESS

NEW CITY

NEW STATE/COUNTRY

TELEPHONE NUMBER
(include area code)

ZIP CODE

MX Carriers only:

I am enclosing a copy of my
Tarjeta de Circulacion (required).

Section**C****NAME CHANGES ONLY**

Is there any change in ownership, management, or control of the company? Are you a Mexican carrier?
Submit Name Change Requests to FMCSALicensing@doh.gov or fax to (202) 366-3477.

- ☐ **Yes** — if you answer yes to one of the questions, you must report a transfer of authority or select one of the options in the next box.
- ☒ **No** — there is no change in ownership; skip the next box and enter new name below it:

I am making one of the following changes which does not require a transfer (select one) but does require documentation (include with form submission):

- | | |
|---|--|
| <input type="radio"/> Addition or deletion of close blood relatives, i.e., child, spouse, or sibling (notarized letter enclosed) | <input type="radio"/> Deletion of spouse due to divorce (copy of divorce agreement enclosed) |
| <input type="radio"/> Addition of partner through marriage (marriage license enclosed) | <input type="radio"/> Incorporating (copy of articles of incorporation from the state government enclosed) |
| <input checked="" type="radio"/> Changes to existing corporation (copy of articles of incorporation from the state government enclosed) | <input type="radio"/> I am an MX carrier and am also enclosing a copy of my Tarjeta de Circulacion |
| <input type="radio"/> Deletion of partner through death (copy of death certificate enclosed) | |

Pro-GL, INC.

Pro-GL, Inc.

NEW LEGAL NAME
(personal, partnership, or corporation)

NEW "DOING BUSINESS AS NAME"
(if different from legal name)

- ☒ I authorize the Federal Motor Carrier Safety Administration to charge \$14 to the credit card below for this name change.
- ☐ I have attached payment in the amount of \$14 in the form of a check or money order, payable to FMCSA, to the address in Section E.

Section**D****REINSTATEMENT OF OPERATING AUTHORITY ONLY**

Submit Reinstatements to FMCSAReinstatement@doh.gov or fax (202) to 385-2422.

I would like to reinstate the following authority(s):

Motor carrier operating authority Broker authority Freight Forwarder authority

Please check the box to indicate your assent to this statement:

I understand that reinstatements may not be processed immediately. It is the responsibility of the motor carrier to ensure that they are in full compliance with all FMCSA regulations prior to beginning interstate operations. More instructions can be found at www.fmcsa.dot.gov.

AND check one of the following options:

- ☐ I authorize the Federal Motor Carrier Safety Administration to reinstate the operating authority of the Motor Carrier/Broker/Freight Forwarder identified above. I understand that the credit card below will be charged \$80, and that this Authorization will be stored electronically with the credit card number obscured, except for the last four numbers.
- ☐ I authorize the Federal Motor Carrier Safety Administration to reinstate the operating authority of the Motor Carrier/Broker/Freight Forwarder identified above. I have attached payment of \$80 in the form of a check or money order, payable to FMCSA, to the address in section E.

Section**E****PAYMENT: NAME CHANGES AND REINSTATEMENTS ONLY**

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5152413004798781

CREDIT CARD NUMBER

- ☐ VISA ☒ MasterCard 02/20
- ☐ American Express ☐ Discover

EXPIRATION DATE

PAYMENT: \$14 (Name Change)

Angel M Lugo

3824 Cedar Springs Rd

Dallas,

NAME ON CARD

BILLING ADDRESS

CITY

Texas

75219

7/25/16

STATE/PROVINCE

ZIP CODE

SIGNATURE

DATE

I am paying with a check or money order, which I will send with this form to:

- ☐ **Regular mail:**
Federal Motor Carrier Safety Administration
P.O. Box 530226
Atlanta, GA 30353-0226

- ☐ **Overnight express mail:**
Bank of America
Lockbox Number 530226
1075 Loop Road
Atlanta, GA 30337

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United States Department of Transportation
Federal Motor Carrier Safety Administration

FMCSA — Office of Registration & Safety Information
6th Floor, 1200 New Jersey Ave. SE, Washington, DC
Fax: (202) 366-3477 (Licensing)
(202) 385-2422 (Insurance)
Customer Service: (800) 832-5660

FMCSA Office of Registration and Safety Information
Motor Carrier Records Change Form

FORM MCSA-5889

Name and address changes and reinstatements of operating authority can be requested on our web site at

(supporting documents must be submitted separately). If you do not have access to the Internet you may submit this form to the above address or fax to 202-366-3477. There is no fee for an address change, but name changes cost \$14 and reinstatements \$80. For more assistance with these transactions and other Registration, Licensing and Insurance functions (including transfers of operating authority), see the FAQs at

Please submit all the requested data in Section A as represented in your current DOT records. Changes can be indicated in Section B for address changes, Section C for name changes, and Section D for Reinstatements. Credit card information can be submitted in Section E. Any partially-submitted data will be kept for 30 days. If the rest of the information is not submitted within that time, the submitted data will be discarded. **FMCSA cannot make any changes until all required data is supplied.**

Section

A

ALL MUST COMPLETE

7/19/16

TODAY'S DATE

jvfreightservice@gmail.com

REQUESTOR'S FAX NUMBER (include area code)

REQUESTOR'S E-MAIL ADDRESS (if any)

MOTOR CARRIER IDENTIFICATION INFORMATION:

Coyote Logistics

Coyote Logistics

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Dallas

TX

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214-295-6383

STREET ADDRESS

CITY

STATE/PROV.

ZIP CODE

TELEPHONE NUMBER
(include area code)

PHONE NUMBERS:

214-295-6383

214-295-6383

CURRENT BUSINESS NUMBER
(include area code)

CURRENT CELL PHONE
NUMBER (include area code)

APPLICANT/REPRESENTATIVE SIGNATURE:

Form was completed by: ☐ Applicant ☒ Representative

ALFONSO TRILLO

NAME (print or type)

CEO

TITLE

SIGNATURE

Section

B

ADDRESS CHANGES ONLY

Submit Address Change Requests to FMCSALicensing@dhs.gov or fax to (202) 366-3477.

MX Carriers only:

I am enclosing a copy of my
Tarjeta de Circulacion (required).

Same

NEW STREET ADDRESS

NEW CITY

NEW STATE/COUNTRY

TELEPHONE NUMBER
(include area code)

ZIP CODE

From: **FMCSA Customer Service** FMCSAInsurance@dot.gov
Subject: Operating Authority - Name Change [Incident: 160725-000827]
Date: July 25, 2016 at 10:39 AM
To: jvfreeservice@gmail.com



Recently you requested assistance from FMCSA Contact Center support. Below is a summary of your request and our response.

Subject

Operating Authority - Name Change

Response By Email (Karla L) (07/25/2016 11:39 AM)

Hello,

I have attached a blank MCSA-5889 form to update the name of the company.

All completed MCSA-5889 forms must contain:

- Your DOT/MC numbers on each page
- Your contact phone number/e-mail address
- Your current address
- The current company name
- The new company name

If you are a sole proprietor or partnership, you must put your name/the partnership name plus the "doing business as" name, if it's different

If you are a corporation/LLC, you must register with the state first, then when you have received articles of incorporation from the state, fax a copy to 202-366-3477 with your completed MCSA-5889 form:

- The statement that there is no change in ownership, control, or management of the company (included in the form)
- If the name change is a result of you having incorporated the company, you MUST fax or email a copy of the Articles of Incorporation (after you receive them from the state - see above instructions for new company name)

Please note that while you may have submitted a request for a



☐ Remind Me 

☐ Add Note 

Update

Inbox x



People



Jason Velasquez

3:13 PM (22 hours ago) ☆

Taylor, Good evening, I just wanted to confirm with you about the email I sen...

Taylor

Add



Taylor Callsen <TaylorCallsen@truckstop.com>

4:08 PM (21 hours ago) ☆



🔒 to me 

Yes Jason sorry as soon as the FMCSA shows the changes I will get it updated!

From: Jason Velasquez [mailto:jvfreightservice@gmail.com]

Sent: Monday, July 25, 2016 2:14 PM

To: Taylor Callsen <TaylorCallsen@truckstop.com>

Subject: Update

Taylor,

Good evening,

I just wanted to confirm with you about the email I send earlier and that the updates will be done.

Thanks

--

God Bless American

On Jul 27, 2016, at 7:11 AM, FMCSA Customer Service <FMCSAInsurance@dot.gov> wrote:

Response By Email (Kristina) (07/27/2016 08:11 AM)

Hello,

Recently you requested assistance from FMCSA Contact Center support. We received your request; however, we were unable to process your request due to the following:

Section A must have the printed name of the person making the request.

Please resubmit your corrected form. If you have additional questions, please contact us again.

If you have additional questions or need further assistance please contact us via <https://ask.fmcsa.dot.gov/app/ask/> or call the FMCSA contact center number listed below.

Thank you,
FMCSA Contact Center
Phone: 1-800-832-5660
Ask a Question: <https://ask.fmcsa.dot.gov/app/ask/>

Reminder: You may update your record immediately at our FMCSA registration portal which can be accessed from www.fmcsa.dot.gov.

Customer By Service Email (Jason Velasquez) (07/25/2016 05:22 PM)

On Mon, Jul 25, 2016 at 12:51 PM, FMCSA Customer Service <FMCSAInsurance@dot.gov> wrote:

--

God Bless American

--
Pro-Ground Logistics, Inc.



God Bless America

Freight Coordinator
Jason Velasquez
Phone: 469-643-6972
Office: 214-295-8363
Email: jvfreightservice@gmail.com

Response By Email (Kristina) (07/28/2016 10:40 AM)

Hello,

Recently you requested assistance from FMCSA Contact Center support. We received your request; however, we were unable to process your request due to the following:

The form must be submitted as an attachment. It can not be viewed properly if submitted in the body of the email.

Please resubmit your corrected form. If you have additional questions, please contact us again.

If you have additional questions or need further assistance please contact us via <https://ask.fmcsa.dot.gov/app/ask/> or call the FMCSA contact center number listed below.

Thank you,
FMCSA Contact Center
Phone: 1-800-832-5660
Ask a Question: <https://ask.fmcsa.dot.gov/app/ask/>

Reminder: You may update your record immediately at our FMCSA registration portal which can be accessed from www.fmcsa.dot.gov.

EXHIBIT C

☐ USDOT Number ☒ MC/MX Number ☐ Name

Enter Value: 963906

Search

Company Snapshot

PRO GL INC

USDOT Number: 2873615

ID/Operations | [Inspections/Crashes In US](#) | [Inspections/Crashes In Canada](#) | [Safety Rating](#)

Carriers: If you would like to update the following ID/Operations information, please complete and submit form [MCS-150](#) which can be obtained [online](#) or from your State FMCSA office. If you would like to challenge the accuracy of your company's safety data, you can do so using FMCSA's [DataQs](#) system.

Carrier and other users: FMCSA provides the Company Safety Profile (CSP) to motor carriers and the general public interested in obtaining greater detail on a particular motor carrier's safety performance then what is captured in the Company Snapshot. To obtain a CSP please visit the [CSP order page](#) or call (800)832-5660 or (703)280-4001 (Fee Required).

For help on the explanation of individual data fields, click on any field name or for help of a general nature go to [SAFER General Help](#).

The information below reflects the content of the FMCSA management information systems as of 08/02/2016. Carrier VMT Outdated.

Other Information for this Carrier

▼ [SMS Results](#)

▼ [Licensing & Insurance](#)

Entity Type:	Broker Only														
Operating Status:	AUTHORIZED FOR BROKER Property	Out of Service Date:	None												
Legal Name:	PRO GL INC														
DBA Name:															
Physical Address:	6119 GREENVILLE AVE # 546 DALLAS, TX 75206														
Phone:	(469) 643-6972														
Mailing Address:	6119 GREENVILLE AVE # 546 DALLAS, TX 75206-1910														
USDOT Number:	2873615	State Carrier ID Number:													
MC/MX/FF Number(s):	MC-963906	DUNS Number:	--												
Power Units:	0	Drivers:													
MCS-150 Form Date:	04/04/2016	MCS-150 Mileage (Year):													
Operation Classification:															
<table border="0"> <tr> <td>X Auth. For Hire</td> <td>Priv. Pass.(Non-business)</td> <td>State Gov't</td> </tr> <tr> <td>Exempt For Hire</td> <td>Migrant</td> <td>Local Gov't</td> </tr> <tr> <td>Private(Property)</td> <td>U.S. Mail</td> <td>Indian Nation</td> </tr> <tr> <td>Priv. Pass.(Business)</td> <td>Fed. Gov't</td> <td></td> </tr> </table>				X Auth. For Hire	Priv. Pass.(Non-business)	State Gov't	Exempt For Hire	Migrant	Local Gov't	Private(Property)	U.S. Mail	Indian Nation	Priv. Pass.(Business)	Fed. Gov't	
X Auth. For Hire	Priv. Pass.(Non-business)	State Gov't													
Exempt For Hire	Migrant	Local Gov't													
Private(Property)	U.S. Mail	Indian Nation													
Priv. Pass.(Business)	Fed. Gov't														
Carrier Operation:															
<table border="0"> <tr> <td>Interstate</td> <td>Intrastate Only (HM)</td> <td>Intrastate Only (Non-HM)</td> </tr> </table>				Interstate	Intrastate Only (HM)	Intrastate Only (Non-HM)									
Interstate	Intrastate Only (HM)	Intrastate Only (Non-HM)													
Cargo Carried:															
<table border="0"> <tr> <td>X General Freight</td> <td>Liquids/Gases</td> <td>Chemicals</td> </tr> <tr> <td>Household Goods</td> <td>Intermodal Cont.</td> <td>Commodities Dry Bulk</td> </tr> <tr> <td>Metal: sheets, coils, rolls</td> <td>Passengers</td> <td>Refrigerated Food</td> </tr> <tr> <td>Motor Vehicles</td> <td>Oilfield Equipment</td> <td>Beverages</td> </tr> </table>				X General Freight	Liquids/Gases	Chemicals	Household Goods	Intermodal Cont.	Commodities Dry Bulk	Metal: sheets, coils, rolls	Passengers	Refrigerated Food	Motor Vehicles	Oilfield Equipment	Beverages
X General Freight	Liquids/Gases	Chemicals													
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Drive/Tow away	Livestock	Paper Products
Logs, Poles, Beams,	Grain, Feed, Hay	Utilities
Lumber	Coal/Coke	Agricultural/Farm
Building Materials	Meat	Supplies
Mobile Homes	Garbage/Refuse	Construction
Machinery, Large	US Mail	Water Well
Objects		
Fresh Produce		

[ID/Operations](#) | [Inspections/Crashes In US](#) | [Inspections/Crashes In Canada](#) | [Safety Rating](#)

US Inspection results for 24 months prior to: 08/02/2016

Total Inspections: 0
Total IEP Inspections: 0

Note: Total inspections may be less than the sum of vehicle, driver, and hazmat inspections. Go to [Inspections Help](#) for further information.

Inspections:

Inspection Type	Vehicle	Driver	Hazmat	IEP
Inspections	0	0	0	0
Out of Service	0	0	0	0
Out of Service %	0%	0%	0%	0%
Nat'l Average % (2009- 2010)	20.72%	5.51%	4.50%	N/A

Crashes reported to FMCSA by states for 24 months prior to: 08/02/2016

Note: Crashes listed represent a motor carrier's involvement in reportable crashes, without any determination as to responsibility.

Crashes:

Type	Fatal	Injury	Tow	Total
Crashes	0	0	0	0

[ID/Operations](#) | [Inspections/Crashes In US](#) | [Inspections/Crashes In Canada](#) | [Safety Rating](#)

Canadian Inspection results for 24 months prior to: 08/02/2016

Total inspections: 0

Note: Total inspections may be less than the sum of vehicle and driver inspections. Go to [Inspections Help](#) for further information.

Inspections:

Inspection Type	Vehicle	Driver
Inspections	0	0
Out of Service	0	0
Out of Service %	0%	0%

Crashes results for 24 months prior to: 08/02/2016

Note: Crashes listed represent a motor carrier's involvement in reportable crashes, without any determination as to responsibility.

Crashes:

Type	Fatal	Injury	Tow	Total
Crashes	0	0	0	0

ID/Operations | Inspections/Crashes In US | Inspections/Crashes In Canada | Safety Rating

The Federal safety rating does not necessarily reflect the safety of the carrier when operating in intrastate commerce.

Carrier Safety Rating:

The rating below is current as of: 08/02/2016

Review Information:

Rating Date:	None	Review Date:	None
Rating:	None	Type:	None

[SAFER Home](#) | [Feedback](#) | [Privacy Policy](#) | [USA.gov](#) | [Freedom of Information Act \(FOIA\)](#) | [Accessibility](#) | [OIG Hotline](#) | [Web Policies and Important Links](#) | [Plug-ins](#)

Federal Motor Carrier Safety Administration
1200 New Jersey Avenue SE, Washington, DC 20590 • 1-800-832-5660 • TTY: 1-800-877-8339 • [Field Office Contacts](#)

Subject: Fwd: Settlement Agreement - Coyote Logistics.DOCX

From: ALEXANDRA ROMERO <alexandraromero29@yahoo.com>

Date: Thu, 04 Aug 2016 13:34:31 -0500

To: usa1454@fedex.com

Sent from my iPhone

Begin forwarded message:

From: <palnitkarb@gtlaw.com>

Date: August 2, 2016 at 10:15:59 AM CDT

To: <alexandraromero29@yahoo.com>

Cc: <NelsonC@gtlaw.com>

Subject: Re: Settlement Agreement - Coyote Logistics.DOCX

No we are not giving you 30 days this deal is only valid for one more day or I am reinstating the monetary provisions. I need to see your IDs before you sign- please provide me a time tomorrow where I can see everyone's IDs. We can alter the legal provision to say you chose to sign without counsel. I can work with you on that.

On Aug 2, 2016, at 10:00 AM, ALEXANDRA ROMERO

<alexandraromero29@yahoo.com<mailto:alexandraromero29@yahoo.com>>

wrote:

Good Morning Bina,

The contract looks like it's what we agreed on after seeing the judge yesterday, you removed the monetary provision as agreed and we also agreed on the release of dispute two parts of a settlement has been met I believe we do have a settlement at this point.

However some other requirements has been specified in your email not sure what your motives or assumptions are or even if what you are asking for its directly pertinent to the case if that is in fact a fact then I guess We have to do it as specified.

Due to the fact that I'm not sure what is in the best interest of my investment into the company after revising Part 17 of the contract which reads:

17. Legal Advice.

All parties to this Agreement acknowledge and represent that they are executing this Agreement after having received full legal advice from counsel of their choice. The undersigned certify that they have read the entirety of this Agreement, and fully understand the terms and conditions of settlement.

I'm requesting a 30 days period to be able to find resources to seek full legal advice to exercise this part of the contract before taking any other step, having that said I want to specify that Im not using this period or refusing to sign this settlement agreement by any means, at this point I totally agree to the terms of the contract to the best of my knowledge, and will act upon these terms as agreed on in front of the judge on 08/01/2016

And I will sign it in due time.

Sent from my iPhone

On Aug 1, 2016, at 4:47 PM,

[<palnitkarb@gtlaw.com>](mailto:palnitkarb@gtlaw.com)[<mailto:palnitkarb@gtlaw.com>](mailto:palnitkarb@gtlaw.com)>>

[<palnitkarb@gtlaw.com>](mailto:palnitkarb@gtlaw.com)[<mailto:palnitkarb@gtlaw.com>](mailto:palnitkarb@gtlaw.com)>> wrote:

Jason/Alfonso/Maria:

Here is the settlement removing the monetary provision – for now - assuming we can get this done. The consent judgment is also attached.

To be clear, we will need to see everyone's IDs before they sign the Settlement Agreement to verify their identity so we can be certain that whomever is signing

Case 3:16-cv-02132-G Document 26 Filed 08/09/16 Page 28 of 28 PageID 319
is who they say they are. This is a non-negotiable point. We are not having a
settlement agreement between the parties when we do not know who is signing.
I can meet you in person to do this.

If you refuse to prove your identities, Coyote will move for the Court to proceed
with this litigation and ask the Judge to have you come to Court and verify your
identities on the record.

Bina

Bina Palnitkar

Greenberg Traurig, LLP | 2200 Ross Avenue, Suite 5200 | Dallas, TX 75201

Tel 214.665.3727 | Fax 214.665.5947

palnitkarb@gtlaw.com<<mailto:palnitkarb@gtlaw.com>> |

www.gtlaw.com<<http://www.gtlaw.com/>>

<image001.jpg>

If you are not an intended recipient of confidential and privileged information in
this email, please delete it, notify us immediately at

postmaster@gtlaw.com<<mailto:postmaster@gtlaw.com>>, and do not use or
disseminate such information.

<21353055_v 2_Settlement Agreement - Coyote Logistics.pdf>

<21374286_v 2_Consent Judgment.pdf>